Remarks

This Application has been carefully reviewed in light of the Office Action mailed December 13, 2006. Claims 1, 9, 14-17, and 19 have been amended and Claim 19 has been cancelled. Applicants respectfully submit that no new matter has been added to the amended claims. Applicants respectfully request reconsideration and allowance of all pending claims.

I.   The Claims are Allowable Over the Proposed *Khan-Hanson* Combination

The Examiner rejects Claims 1-20 under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent Application Publication No. 2002/018078 A1 to Khan et. al. (*"Khan"*) and U.S. Patent No. 6,101,509 to Hanson et al. (*"Hanson"*). Applicants respectfully disagree.

The Proposed *Khan-Hanson* Combination Fails to Disclose, Teach, or Suggest

Various Limitations Recited in Independent Claims 1, 9, and 14-17.

As one example, the proposed *Khan-Hanson* combination fails to disclose, teach, or suggest:

> presenting the determined list of elements to a user in a navigation pane, the navigation pane presenting the determined list of elements in the form of a tree structure that provides a visual representation of relationships between the elements corresponding to particular portions of the content of the identified web page, the navigation pane operable to allow the user to view and select one or more of the elements corresponding to particular portions of the content of the identified web page from the determined list of elements

as recited in independent Claim 1, as amended.

Khan discloses a process for generating a customizable network user interface. (Page 5, Paragraph 73). However, as acknowledged by the Examiner, *Khan* fails to disclose "presenting the determined list of elements to a user in a navigation pane," as recited in independent Claim 1. (Office Action, Page 17). Accordingly, *Khan* also fails to disclose "the navigation pane presenting the determined list of elements in the form of a tree structure that provides a visual representation of relationships between the elements corresponding to particular portions of the content of the identified web page" and "the navigation pane operable to allow the user to view and select one or more of the elements corresponding to particular portions of the content of the identified web page from the determined list of elements," as recited in independent Claim 1, as amended.

In the Examiner's rejection of Claim 19, the Examiner asserts that *Khan* discloses "providing a view of the relationships between the associated elements in the form of a tree structure." (Office Action, Page 16). In support of this assertion, the Examiner relies on Page 6, Paragraphs 84-85 of *Khan*. This portion of *Khan* discloses that, after a user generates their customized user interface (or "view"), the user can publish that customized user interfaces in a directory. According to the Examiner, this "directory represents a tree structure form." (*Id.*). Applicants respectfully submit that even if a directory could be construed as a tree structure, publishing a user interface in a directory cannot properly be construed as "presenting the determined list of elements in the form of *a tree structure that provides a visual representation of relationships between the elements corresponding to particular portions of the content of the identified web page*," as recited in independent Claim 1, as amended.

Applicants respectfully submit that *Hanson* fails to overcome the inadequacies of *Khan*. According to the Examiner, *Hanson* "clearly discloses the use of navigation panes . . ." (Office Action, Page 17). The Examiner asserts that the navigation panes are disclosed in *Hanson* at Colum 12, Lines 1-10. (Office Action, Page 4). *Hanson* discloses an object-oriented HTML based editor for creating web documents. (Column 5, Lines 32-33). *Hanson* describes "objects" as being selected from a library of predefined HTML header or body objects. (Column 9, Lines 46-51). The editor in *Hanson* allows a user to select these objects from a palette of objects (or "widgets) and drag them into a "page structured panel 608." (Column 10, Linee 62 - Column 11, Line 1). The "page structured panel 608" includes a list of icons representing the objects and the associated properties for those objects. (*See* Figure 6C). Once the object is in the "page structured panel 608," the user can edit certain properties associated with the object. (Column 11, Line 65 - Column 12, Line 14). However, the library of predefined objects disclosed in *Hanson* are not determined by analyzing an identified web page and the library of predefined objects disclosed in *Hanson* cannot properly be construed as "elements corresponding to particular portions of the content of the identified web page." Accordingly, the page structured panel in 608 cannot be properly construed as a "navigation pane presenting the determined list of elements." Furthermore, the list of icons representing the objects and their properties cannot properly be construed as "*a tree structure*

that provides a visual representation of relationships between the elements corresponding to particular portions of the content of the identified web page," as recited in Claim 1.

Independent Claims 1, 9, and 14-17 are allowable for at least these reasons. Dependent Claims 2-8, 10-13, 18, and 20 depend from independent Claims 1 and 9, shown above to be allowable. For at least this reason, dependent Claims 2-8. 10-13, 18, and 20 are also allowable. For at least these reasons, Applicants respectfully request reconsideration and allowance of all pending claims.

II.   No Waiver

All of Applicants' arguments and amendments are without prejudice and disclaimer. Additionally, Applicants have merely discussed example reasons for allowability sufficient to overcome the Examiner's rejections. Applicants reserve the right to discuss additional reasons for allowance, such as additional distinctions over the references cited, the improper combination of the cited references, or the improper use of one or more references as prior art, in a later Response or on Appeal, if appropriate. By not responding to additional statements made by the Examiner, Applicants do not acquiesce to the Examiner's additional statements.

Conclusion

Applicants have made an earnest attempt to place this case in condition for allowance. For the foregoing reasons, and for other reasons clearly apparent, Applicants respectfully request full allowance of all pending claims.

If the Examiner believes that a telephone conference would advance prosecution of this Application in any manner, the Examiner is invited to contact Samir A. Bhavsar, Attorney for Applicants, at the Examiner's convenience at (214) 953-6581.

Although Applicants believe no fee is due, the Commissioner is hereby authorized to charge any fee or credit any overpayment to Deposit Account No. 02-0384 of Baker Botts L.L.P.

Respectfully submitted,

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Date: _March 13, 2007_

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